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STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Matt Blunt, Governor • Doyle Childers, Director

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**SEP 12 2008**

CERTIFIED MAIL #: 7007-3020-0003-2221-3901  
RETURN RECEIPT REQUESTED

Mr. Allen Steinkamp  
Environmental Manager  
Allied Waste Industries, Inc.  
13570 St. Charles Rock Road  
Bridgeton, MO 63044



RE: Telephone Conference with the Environmental Protection Agency Regarding the West Lake Landfill Site and the Bridgeton Landfill, Solid Waste Disposal Area Permit Number 118912, St. Louis County

Dear Mr. Steinkamp:

This letter is intended to provide details of a recent telephone conference call the Missouri Department of Natural Resources held with the U.S. Environmental Protection Agency (EPA) on August 22, 2008, regarding the West Lake Landfill Site in Bridgeton. The purpose of the call was to discuss any potential conflicts and overlap between the Bridgeton Landfill closure activities administered by the department's Solid Waste Management Program (SWMP), and the selected remedies outlined in the Records of Decision for Operable Unit 2 (OU-2 ROD) and Operable Unit 1 (OU-1 ROD). The RODs were prepared in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Participating in the call were Scott Waltrip, and J.P. Boessen of the department's SWMP, Shawn Muenks and Brandon Doster of the department's Hazardous Waste Program (HWP), and Dan Wall of the EPA.

During the conference call remediation and closure activities that will occur at the site in the near future as outlined in the RODs were discussed. As you know, the OU-2 ROD specifies that all of the permitted landfills within OU-2 are to be closed in accordance with the requirements of the Missouri Solid Waste Management Law and Regulations. The department's concerns with the quality of the cap constructed over approximately sixteen (16) acres of the Bridgeton Landfill in 2005, which we have described to you in previous correspondence, were also discussed. One of the specific purposes of the conference call was to ensure that any alternative approach to cap certification the SWMP may consider approving would meet the objectives of the OU-2 ROD.

An understanding was reached with the EPA that the SWMP will ultimately be responsible for evaluating the closure of all areas of OU-2 that are regulated under a solid waste disposal area permit. SWMP staff mentioned that the closure requirements for the permitted areas may vary somewhat depending on the law and regulations in effect at the time and the specific requirements of the permits, and that we will evaluate each permitted area on a case by case basis. An understanding was also reached with the EPA that any reasonable alternative capping or certification procedures for the Bridgeton Landfill that are deemed

satisfactory by the SWMP will meet the objectives of the ROD. Of course, the closure requirements for any area(s) contaminated with radioactive material will likely exceed the requirements of the solid waste law and regulations. Essentially, the EPA will defer to the department on proper closure of all permitted areas not contaminated with radioactive material.

The next phase of the CERCLA process will involve development of the Remedial Design/Remedial Action work plan (RD/RA). We understand RD negotiations have been recently initiated and negotiations for the RA work plan are expected to begin by September 30, 2008. We believe it is in everyone's best interest to wait until the RD has been finalized before you consider any further actions to evaluate the cap on the sixteen (16) acre area of the Bridgeton Landfill in question. This will help minimize potential wasted effort on your part. One thing you need to consider, for example, is that the OU-1 cap is likely to overlap a significant distance onto the cap of the Bridgeton Landfill and may reduce the area you need to retest or remediate. Other aspects of the RD/RA work plan may affect your decisions as well.

On October 23, 2007, several staff members from the SWMP met with you, Mr. Rick Walker, Operations Manager, Bridgeton Landfill Authority and Ms. Michelle Boussad, Project Manager, Aquaterra Environmental Solutions, Inc., to discuss issues concerning the Bridgeton Landfill. One of the items we discussed was a summary report that your consultants were planning to prepare to address closure of all permitted areas at the site. Based on the telephone conference with EPA, the department will need to review this report and reach an understanding with you regarding the closure requirements for each area as soon as possible. This will not only eliminate any confusion between yourself and the department, but it will be necessary during the RD process and enable us to provide meaningful input during development of the RD/RA work plan. Therefore, please submit the summary report within sixty (60) days of the date of this letter.

Please ensure that the report includes, at a minimum, the following:

1. A plan sheet showing the location of all permitted landfills at the West Lake Landfill Site, including the limits of waste for each landfill. The solid waste and CERCLA files contain similar drawings showing outlines for the numerous permitted landfills. Our understanding is that these drawings were developed using the best available information from the various permit files, but have never been field verified. Please field verify the extent of waste for each permitted area as closely as is practical, and include in the report a description of the procedures that were used to do this. For areas for which a permit was issued but no waste placement occurred, simply indicate this on the plan sheet. This plan sheet will be extremely valuable to both the CERCLA and the solid waste closure processes, and will ultimately serve as the official record of waste placement at the site.
2. For each permitted area:
  - A. The dates each permit was issued and when the operator ceased accepting waste.
  - B. The regulatory requirements for landfill closure, post-closure, and quality assurance/quality control (QA/QC) that were in effect when the area ceased accepting waste.
  - C. Any specific closure and QA/QC requirements outlined in the permit documents.

Mr. Allen Steinkamp  
Bridgeton Landfill  
Page 3 of 3

- D. A description of the existing landfill cap and any closure or QA/QC activities that were performed, based on available information.
- E. A detailed proposal for any exploration that may be necessary to determine the thickness or quality of the landfill cap.
- F. Proposed closure and QA/QC plans for any area identified as being deficient.
- G. Proposed post-closure plans, if required.

In addition, the RODs contain institutional controls that require the responsible parties to record covenants with the county Recorder of Deeds or equivalent office. EPA will also have provisions in the Consent Decree to allow EPA and the department access to all areas of the site. The solid waste regulations contain similar requirements. We would like to develop one set of these documents to avoid creating additional work for you or the other responsible parties, as well as to minimize review time for the department. Though it would be premature for you to propose a format or specific content of these documents, please keep this in mind, particularly when developing the plan sheets described in item 1, above.

If you have any questions or comments, please contact J. P. Boessen, of my staff at (573) 751-5401 or P.O. Box 176, Jefferson City, Missouri 65102-0176.

Sincerely,

SOLID WASTE MANAGEMENT PROGRAM



Jim Bell  
Chief, Engineering Section

JB:jpbl

- c: Mr. Rick Walker, Operations Manager, Bridgeton Landfill Authority  
Mr. Dan Wall, Environmental Protection Agency  
Ms. Michelle Boussad, Project Manager, Aquaterra  
Matt Ballance, P.E., Senior Project Manager, Aquaterra  
John Haasis, P.E., St. Louis County Department of Health  
Brandon Doster, P.E, Hazardous Waste Program  
Mr. Chris Nagel, Chief, Enforcement Section, Solid Waste Management Program  
Mr. Joe Trunko, St. Louis Regional Office